

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DAVID A. SMILEY,)	
)	
Plaintiff,)	
)	C.A. No. 1:07-005-SLR
v.)	
)	
DAIMLER CHRYSLER,)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	

**INITIAL DISCLOSURES OF DEFENDANT
CHRYSLER LLC PURSUANT TO RULE 26(a)(1)**

Defendant Chrysler LLC, formerly known as Daimler Chrysler Corporation (“Chrysler”), by and through its undersigned attorneys, hereby makes the following disclosures, pursuant to Federal Rule of Civil Procedure 26(a)(1):

(A) Individuals likely to have discoverable information that Defendant may use to support its claims or defenses, and the subjects of the information:

Response:

<u>Individual</u>	<u>Areas of Knowledge</u>
David Smiley	All aspects of Plaintiff’s claims.
Dan Mykolenco*	Plaintiff’s PQX placement; Plaintiff’s grievance.
Dawn Ford*	Plaintiff’s substantiation attempts.
Angelina Fleming*	Plaintiff’s substantiation attempts.
John Mehalshick IV	Plaintiff’s grievance.

Chrysler reserves the right to identify other individuals as its investigation continues.

*These individuals are current Chrysler employees and should be contacted only through counsel for Chrysler.

(B) Documents, data, compilations and tangible things in the possession, custody, or control of Defendant that Defendant may use to support its claims or defenses:

Response:

1. Plaintiff's personnel file;
2. Plaintiff's medical file;
3. Documents regarding the PQX placement search for a job meeting Plaintiff's work restrictions and Plaintiff's placement in such job;
4. Documents regarding Chrysler's substantiation requirements for absences due to illness or injury;
5. Documents regarding Plaintiff's termination from employment;
6. Documents regarding Plaintiff's May 18, 2005 grievance and the resolution thereof.

Chrysler reserves the right to identify other categories of documents as its investigation continues.


(C) A computation of any category of damages claimed by Defendant:

Response: None.

(D) Insurance agreements under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action, or to indemnify or reimburse defendant for payments made to satisfy the judgment:

Response: None.

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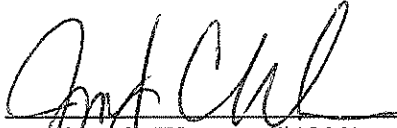
Dated: December 3, 2007
830944 / 31959

*Attorneys for Defendant Chrysler LLC
(formerly known as DaimlerChrysler
Corporation)*

CERTIFICATE OF SERVICE

I, Jennifer C. Wasson, hereby certify this 3rd day of December, 2007, that the foregoing **INITIAL DISCLOSURES OF DEFENDANT CHRYSLER LLC PURSUANT TO RULE 26(a)(1)** was electronically filed with U.S. District Court District of Delaware via CM/ECF (Official Court Electronic Document Filing System) and two (2) true and correct copies were sent First Class U.S. Mail, postage prepaid, to the following:

David A. Smiley
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